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7 *Attorneys for I. Q. Data International, Inc.*

8  
9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

11 Tai Wood, ) Case No.: 2:19-cv-02040-APG-NJK  
12 )  
Plaintiffs, )  
13 v. ) **STIPULATION AND ORDER TO**  
I. Q. Data International, Inc., ) **EXTEND TIME FOR I.Q. DATA**  
14 ) **INTERNATIONAL, INC. TO**  
Defendants. ) **RESPOND TO COMPLAINT [ECF**  
15 ) **NO. 1]**  
16 ) **(THIRD REQUEST)**

17 Pursuant to Local Rules 6-1 and 7-1, Plaintiff Tai Wood (“Plaintiff”) and Defendant I.Q.  
18 Data International, Inc. (“I.Q. Data”), by and through their respective attorneys of record,  
19 stipulate as follows:

20 **STIPULATION**

- 21 1. Plaintiff filed the Complaint on November 25, 2019. *See* ECF No. 1.  
22 2. I.Q. Data was served with the Summons and Complaint on November 27, 2019.  
23 3. I.Q. Data and Plaintiff have been exploring early resolution. To that end, the  
24 Court previously granted I.Q. Data two extensions to respond to the Complaint by January 31,  
25 2020. ECF Nos. 8, 10.  
26 4. At this time, Plaintiff anticipates filing an amended complaint to include  
27 additional allegation(s) and claim(s).  
28 5. For judicial economy, and to help facilitate the on-going settlement discussions,

1 Plaintiff and I.Q. Data agree that I.Q. Data will not need to file a response to the current  
2 operative Complaint.

3 6. Plaintiff will file his Amended Complaint by February 14, 2020.

4 7. I.Q. Data will have three (3) weeks thereafter to file its response to the Amended  
5 Complaint.

6 8. In the event Plaintiff does not file his Amended Complaint, the parties agree that  
7 I.Q. Data's response to the Complaint will be due on or before February 21, 2020.

8 9. This request for an extension is made in good faith and not for purposes of delay  
9 but to help resolve any and all potential claims Plaintiff may assert in this case.  
10

11 DATED: January 31, 2020.

DATED: January 31, 2020.

12 GORDON REES SCULLY MANSUKHANI,  
13 LLP

KIND LAW

14 /s/ Wing Yan Wong

/s/ Michael Kind

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21 **ORDER**

22 IT IS SO ORDERED.

23  
24  
25   
UNITED STATES MAGISTRATE JUDGE

26 DATED: February 3, 2020  
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